

Propylene Streams Category- Comments of Environmental Defense

(Submitted via Internet 4/25/02)

The Environmental Defense is pleased to have the opportunity to submit comments on the test plan for the Propylene Streams Category.

An itemized list of data necessary to meet SIDS requirements is not included in the robust summary submitted. However, as explained in the test plan, data describing many environmental parameters are limited or incomplete due to the fact that gaseous substances such as propylene streams are difficult to test. Further, it is well established that such volatile materials dissipate prior to significant environmental accumulation; therefore, parameters relating to bioaccumulation and degradation are not likely to be a problem. Nonetheless, animal studies can be performed as evidenced by the fact that a two-year cancer bioassay was conducted in rats and mice exposed at up to 10,000 ppm propylene in the inhaled air. Results of this study indicate minimal adverse effects on the general health of exposed animals were observed. No increased incidences of cancer were observed. All tests for genotoxicity done to date have proved negative. Data for developmental and reproductive toxicity were not included in the two-year studies and are not available; the sponsor proposes to conduct such studies through the HPV initiative (via the International Council of Chemical Associations program).

A deficiency in this report is the failure to provide a reference for the study in which studies of petroleum workers exposed to many chemicals failed to establish increased cancer rates that can be associated with propylene exposure. This section of the report is also somewhat ambiguous in that it fails to clearly state whether petroleum workers considered in these studies have increased cancer rates. Further, if petroleum workers do have increased cancer rates, this section fails to state whether, due to the complexity of the mixture of chemicals to which they are exposed, any chemical can be established as a source of those increased cancer rates. Clarification of this section would be desirable.

It should also be noted that items (ii) and (iii) (respectively the Executive Summary and List of Member Companies) listed in the table of contents are not actually included in report.

Thank you for this opportunity to comment.

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